

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ARISE FOR SOCIAL JUSTICE;	)	
¿OISTE?; NEW ENGLAND STATE-AREA	)	
CONFERENCE OF THE NAACP;	)	
REV. TALBERT W. SWAN, II;	)	
NORMAN W. OLIVER; DARLENE	)	
ANDERSON; GUMERSINDO GOMEZ;	)	
FRANK BUNTIN; RAFAEL RODRIQUEZ;	)	
and DIANA NURSE	)	Civil Action No. 05-30080-MAP
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
	)	
CITY OF SPRINGFIELD and SPRINGFIELD	)	
ELECTION COMMISSION	)	
	)	
Defendants.	)	
	)	

**DEFENDANTS' AFFIDAVIT OF DIRECT TESTIMONY**  
**NOEMI SANTIAGO, BILINGUAL POLL OFFICIAL**  
**2006 ELECTION**

I, Noemi Santiago, on oath, do hereby state as follows:

1) My name is Noemi Santiago. I currently live on Page Blvd, Springfield, Massachusetts. I was born in Connecticut, but have lived in Springfield for the past 40 years or so. My mother and father were born in Puerto Rico and relocated to Springfield, Massachusetts when they each were about 15 years old. While my father is fluent in English and Spanish, my mother has limited proficiency in English. Spanish was always spoken in our home. For the past 41 years, my father, Rev. Juan Carde, has served as the pastor of the Spanish Christian Church, in which services on Tuesday, Thursday, Friday and Sunday were conducted entirely in Spanish. My children are not as proficient in Spanish as I would have wished, but rather managed to teach their grandparents more English than they acquired Spanish. While they do understand when I speak to them in Spanish, they often respond to me in English.

2) I attended the High School of Commerce and then attended Springfield Technical Community College and Cambridge College, from which I received a Bachelor's Degree

and a Masters Degree in Education. I have worked for the Holyoke Department of Social Services as a Social Worker for more than 20 years. My proficiency in Spanish is needed on a daily basis. I grew up in the home in which I currently live with my children. My father built two additional homes on either side of my childhood home – in one of which my parents currently live; in the other my brother-in-law John A. Ramirez, Springfield Election Commissioner, lives with his wife and family. The Carde-Santiago-Ramirez family occupy a corner on Page Blvd. When my father first moved to our home on Page Blvd. more than 20 years ago, at which time we were the second Hispanic family to have moved to this neighborhood, I do not recall experiencing any difficulties.

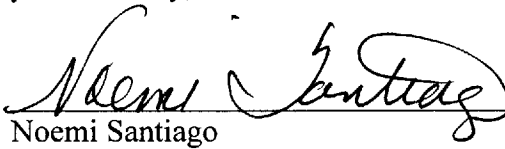
3) My sister and I take my mother to the polling place (St. Mary's Church, Precinct 8A) to vote each election. My mother has some proficiency in English, but feels more comfortable if either my sister or I accompany her. Over the years, I have not been aware that there were voters with limited proficiency in English who were having difficulty voting due to the absence of bilingual poll officials. On the other hand, the increase in the number of Hispanic families in East Springfield, where I live, has been relatively recent. In addition, it often is the case – as with my mother – that family members or friends accompany voters with limited proficiency in English to the polling place. As among my father's congregants I would estimate that not more than one-half of them vote. I am not entirely sure why that is or the degree to which many understand that they can vote or that Spanish language assistance is currently available or was long available to all of those who voted in Ward 1. At one time, various community leaders, Jose Claudio, Carlos Gonzales, and Rep. Cheryl Rivera would bring candidates to speak to the congregation or would speak on behalf of candidates whom they supported. These "candidate forums" have not occurred for some 8 years. I had always believed that it was an effective way to inform the Hispanic community about candidates and issues.

4) I recall that I had heard about the need for bilingual poll officials for the 2006 election on the news – even before my brother-in-law told me about it. At the time, a co-worker, who is also proficient in Spanish, and I decided that we would apply to serve as bilingual poll officials. I was appointed to serve as a warden in the Gentile Apartments Community Center (Precinct 2A and 2B), in which two precincts and two poll worker teams were assigned – something of a "last minute" assignment to ensure that a bilingual poll official was assigned to each precinct, assigned to that polling place. I served as the warden during the 2006 primary and general election. I believe that there were federal observers assigned to the polling place during the primary election. I made sure that I was familiar with the Warden's Handbook and other training materials. I also received assistance from the police officer who was assigned to this polling place. She was very helpful and familiar with many of the procedures and the operation of the optical scanner. In my many years of voting, I have not known of any police officers, assigned to polling locations, who have been anything less than helpful and accommodating to voters.

5) In the Gentile Apartments Community Center, as with other polling locations housed in residences for the elderly, older voters were (are) able to easily get to the polls to vote – even if by walker or wheelchair. It seemed to me that about 20 percent of the voters in the precinct to which I was assigned had some limitation in their proficiency in speaking

and understanding English. I was told on several occasions how "happy" these voters were that there were poll officials who could speak Spanish to provide for instructions as to the correct polling place or some explanation of procedures out of the "normal course" of voting. Most of these voters had some proficiency in English, but felt more comfortable speaking in Spanish. Only about 5 percent of the voters actually needed bilingual assistance from a poll official in the precinct to which I was assigned. While it was a very long day, I would volunteer to serve as a poll official at subsequent elections primarily because I felt that my presence, as well as the presence of other bilingual poll officials, made Hispanic voters feel more comfortable. Hopefully, the continued assignment of bilingual poll officials to most of the other polling places will encourage more Hispanic voters to turn out to vote.

Signed under penalties of perjury, this 13 day of February, 2007

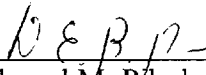
  
Noemi Santiago

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing "Defendants' Affidavit of Direct Testimony Noemi Santiago, Springfield Police Department" has been served on the following counsel of record on the 14th day of February 2007, via the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Nadine Cohen, Esquire  
LAWYERS' COMMITTEE FOR CIVIL RIGHTS UNDER LAW  
OF THE BOSTON BAR ASSOCIATION  
294 Washington Street, Suite 443  
Boston, Massachusetts 02108

Paul E. Nemser, Esquire  
J. Anthony Downs, Esquire  
Monica M. Franceschini, Esq.  
GOODWIN PROCTOR LLP  
Exchange Place  
53 State Street  
Boston, Massachusetts 02109

  
\_\_\_\_\_  
Edward M. Pikula (BBO #399770)  
City Solicitor  
Deanne Bogan Ross (BBO #555407)  
City of Springfield  
Law Department  
36 Court Street, Room 210  
Springfield, Massachusetts 01103